

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BOC AVIATION LIMITED,	:
Plaintiff,	Case No. 22 Civ. 2070 (LJL)
	:
- against -	:
	:
AIRBRIDGECARGO AIRLINES, LLC, and	:
VOLGA-DNEPR LOGISTICS B.V.,	:
	<u>NOTICE OF MOTION FOR</u>
	<u>ATTORNEY'S FEES AND</u>
	<u>COSTS</u>
Defendants.	:
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PLEASE TAKE NOTICE that, upon the Declaration of John G. McCarthy and the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings had herein, plaintiff BOC Aviation Limited (“BOCA”) will move this Court before the Honorable Lewis J. Liman of this Court, at Room 15C, at the United States District Courthouse, located at 500 Pearl Street, New York, New York, at a date to be directed by the Court, for an Order:

- (i) awarding BOCA its attorney’s fees and costs incurred in compelling defendants AirBridgeCargo Airlines, LLC and Volga-Dnepr Logistics B.V.’s compliance with this Court’s Ex Parte Order For Immediate Possession of Aircraft and Injunction (Dkt. 26) and Order for Injunctive Relief (Dkt. 70); and
- (ii) granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the briefing schedule set by the Court on March 3, 2023 (Dkt. 124), an opposition brief solely limited to the issue of the amount of the attorney’s fees, if any, may be filed by March 17, 2023.

Dated: New York, New York
March 10, 2023

SMITH, GAMBRELL & RUSSELL, LLP

By: /s/ John G. McCarthy
John G. McCarthy
Edward J. Heppt

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